

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
WESTERN DIVISION

CASEY VOIGT AND JULIE VOIGT,
Plaintiffs,
-vs-
COYOTE CREEK MINING COMPANY,
L.L.C., a Nevada Limited Liability
Company,
Defendant.

Taken At
Offices of Baumstark Braaten Law Partners
109 North Fourth Street, Suite 100
Bismarck, North Dakota
March 24, 2017

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C O N T E N T S

DEWAYNE LOUNSBURY

Examination by Mr. Braaten 4

CERTIFICATE OF DEPONENT 114

CERTIFICATE OF COURT REPORTER
AND NOTARY PUBLIC 115

DEPOSITION EXHIBITS MARKED:

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6

1 (Deposition of **DEWAYNE LOUNSBURY**, a
2 witness of lawful age, taken on behalf of the
3 Plaintiffs in the above-entitled cause, pending in
4 the District Court of the United States for the
5 District of North Dakota, Western Division,
6 pursuant to Notice of Taking Deposition, before
7 Denise M. Andahl, a Registered Professional
8 Reporter and a Notary Public in and for the State
9 of North Dakota, at the offices of Baumstark
10 Braaten Law Partners, 109 North Fourth Street,
11 Suite 100, in the City of Bismarck, County of
12 Burleigh, State of North Dakota, on the 24th day of
13 March, 2017, commencing at 8:50 a.m., counsel
14 appearing on behalf of the respective parties as
15 hereinbefore indicated:)

16 _____
17 (The following proceedings were had and
18 made of record:)

19 **DEWAYNE LOUNSBURY**,
20 being first duly sworn, was examined and testified
21 as follows:

22 EXAMINATION

23 **BY MR. BRAATEN:**

24 **Q.** Will you state and spell your name for the
25 record, please.

1 a half, around there.

2 **A. Okay.**

3 **Q.** If you do ask for a break, we'll probably
4 just finish whatever question we're on.

5 Can you tell me what you did to prepare
6 for the deposition today?

7 **A. Nothing.**

8 **Q.** Okay. Did you talk to anyone at the mine
9 about the deposition or what we'd be talking about
10 today?

11 **A. Just talked to these guys here.**

12 **Q.** Okay. So other than Chuck and Brian, did
13 you talk to anyone about the deposition today?

14 **A. As far as?**

15 **Q.** So Brenden would be one.

16 **A. Brenden, yes, and Donn.**

17 **Q.** And what did you talk to Brenden and Donn
18 about?

19 **A. Just kind of how it worked.**

20 **Q.** Did you talk about what you might be asked
21 today?

22 **A. Yes.**

23 **Q.** Can you tell me a little bit about that?

24 **MR. WEHLAND:** I have to object because I
25 believe the meetings that Dewayne is referring to

5

7

1 **A. Yeah. It's Dewayne Lounsbury. It's**
2 **D-e-w-a-y-n-e L-o-u-n-s-b-u-r-y.**

3 **Q.** Have you had your deposition taken before?

4 **A. No.**

5 **Q.** Okay. Just a couple of rules. One is I'm
6 going to try to let you finish your answers before
7 I start a question, and vice versa, let me finish
8 the question before you answer, and mainly because
9 she's taking everything down and if we speak at the
10 same time, it's tough for her. So along the same
11 lines, it's difficult because in conversation a lot
12 of times we're just nodding or saying uh-huh or
13 yeah, but you want to try to give yes or no answers
14 if that's appropriate.

15 **A. Okay.**

16 **Q.** If you don't understand the question, will
17 you ask me to clarify it?

18 **A. (Nods.) Yes.**

19 **Q.** That's an example. And so if you answer a
20 question, is it fair for me to assume that you
21 understood that question?

22 **A. Yes.**

23 **Q.** Okay. If you want to take a break at any
24 time, let me know, I think just to move cars and
25 otherwise. We usually take a break every hour and

1 involved me, so that would be privileged.

2 **Q.** (MR. BRAATEN CONTINUING) Okay. So
3 outside of meetings with the attorneys, did you
4 have any conversations with Brenden or Donn about
5 the deposition today?

6 **A. No. They just kind of got me -- you know,**
7 **I've never had to do this before, so see what to**
8 **expect because I'm nervous.**

9 **Q.** Did you review any documents to prepare
10 for the deposition?

11 **A. Just what I do at work.**

12 **Q.** Okay.

13 **A. As far as my documents they showed me, you**
14 **know, my daily log. And then I seen a picture.**

15 **Q.** Okay. And are you familiar with the
16 lawsuit that brings us here today?

17 **A. Not so much.**

18 **Q.** Are you aware of what the claims are in
19 the lawsuit that brings us here today?

20 **A. No. Just, I guess, about dust.**

21 **Q.** Can you tell me a little bit about your
22 background specifically in the mining industry?

23 **A. I've been an operator for -- since I was**
24 **19 down in San Diego, and then I started -- I**
25 **worked at a -- worked at an aggregate plant in**

8

1 San Diego for four years before I moved up here in
 2 2012.
 3 Q. Okay.
 4 A. And I worked for Fisher Industries for six
 5 months up here, and then I went to North American.
 6 Q. Starting in San Diego at the aggregate
 7 plant, what did you do there?
 8 A. I ran a 992 for them, loader, loading
 9 rock.
 10 Q. And then what is the nature of the
 11 business conducted by Fisher Industries?
 12 A. They're sand and gravel.
 13 Q. Did you run a loader there as well?
 14 A. I ran loader, scraper, blade, all kinds of
 15 different stuff.
 16 Q. And then what year did you say you started
 17 at North American?
 18 A. That would have been in 2013. Moved up
 19 here in 2012 and then went there in 2013.
 20 Q. Has all your work for North American been
 21 at the Coyote Creek Mine?
 22 A. No. I worked at Falkirk previously.
 23 Q. Okay. What did you do up at Falkirk?
 24 A. I ran scraper and various pieces of
 25 equipment.

9

1 Q. Okay. How long were you at Falkirk?
 2 A. I started in March of 2013 and then until
 3 we -- April of, was it, '14? I can't remember.
 4 Whenever we opened over there. Been there almost
 5 two years now.
 6 Q. To your knowledge, did you start at Coyote
 7 Creek as soon as Coyote Creek started its
 8 operations?
 9 A. No.
 10 Q. So had they started operations before you
 11 moved there and started working there?
 12 A. Yes.
 13 Q. When you started working with North
 14 American, did they provide any kind of training?
 15 A. Yeah, we went through various trainings.
 16 Q. Can you tell me a little bit about those?
 17 A. Went through new miner training, went
 18 through training about, you know, the new mine and
 19 stuff, and just kind of their annual training we go
 20 through. Since we were at a new mine, we went
 21 through all the annual stuff, environmental stuff.
 22 Q. What kind of environmental training did
 23 they give you?
 24 A. They taught us about the topsoil and the
 25 subsoil and what we'd kind of be taking, what we

10

1 expected and stuff like that.
 2 Q. Did they give you any training specific to
 3 the equipment that you would be operating?
 4 A. Yes.
 5 Q. Can you tell me a little bit about that?
 6 A. Well, some of it I was already certified
 7 on at Falkirk, so we kind of just, you know, run
 8 through it as a group on certain stuff. And stuff
 9 that we hadn't been trained on, or whatever, we got
 10 certified by a certified person.
 11 Q. So let's talk a little bit about from the
 12 time you started at Coyote Creek Mine until now.
 13 What's your position at Coyote Creek?
 14 A. I'm a coal systems operator now.
 15 Q. Okay. Has that changed since you started?
 16 A. Yes. I was just a heavy equipment
 17 operator before.
 18 Q. And what's the difference between a heavy
 19 equipment operator and a coal systems operator?
 20 A. I run the coal plant, and before I just
 21 ran various pieces of equipment.
 22 Q. Okay. Prior to becoming a coal systems
 23 operator, did you run equipment associated with the
 24 coal plant?
 25 A. No, I didn't run none of it yet.

11

1 Q. Okay. And just to be specific, when you
 2 refer to the coal plant, can you tell me what
 3 you're referring to?
 4 A. The 844 rubber tire and the crusher
 5 facility.
 6 Q. And this may be just being ignorant, but
 7 the 844 rubber tire is the dozer; right?
 8 A. Yes.
 9 Q. And so when you became a coal systems
 10 operator, what kind of training did you get?
 11 A. I had to go through the plant with the
 12 electricians, then we had the JDP guy there. I
 13 think he was the -- kind of wrote the program for
 14 the crusher and stuff for my computer. Then Joy
 15 Global and MSD, whoever does the sizer, they came
 16 out and they walked us through everything and what
 17 to expect and all that on there.
 18 Q. You mentioned the JDP guy. What does JDP
 19 stand for?
 20 A. I don't know exactly what it stands for.
 21 It a company name. I don't know.
 22 Q. What does the company JDP do?
 23 A. I think they do like programming --
 24 computer programming and stuff.
 25 Q. So he gave you training on the computer

12

1 program you use to run the coal plant?

2 **A. Yes.**

3 **Q.** And can you tell me a little bit more

4 about that training and the computer program?

5 **A. Well, we walked through what everything**

6 **does on it as far as my computer and the screen and**

7 **if we wanted to change anything, like we wanted**

8 **different buttons to work different stuff on the**

9 **crusher.**

10 **Q.** How long did the training last on the

11 computer program?

12 **A. We kind of did everything, I think, for**

13 **maybe a week or two. We kind of just -- not all on**

14 **one. You know, we kind of went through the**

15 **crushers and everything. And then he was there**

16 **while we ran, you know, to make sure everything was**

17 **running good and stuff.**

18 **Q.** So would he actually be in the dozer with

19 you?

20 **A. No. He was down in the room on his**

21 **laptop.**

22 **Q.** Okay. Would you be communicating with him

23 while you were in the dozer?

24 **A. I could talk to him on the radio or I**

25 **could go down and talk to him.**

13

1 **Q.** Okay. So other than when you were working

2 with the program operating the dozer, did you also

3 have some sort of classroom training on the

4 program?

5 **A. No. Just pretty much in the field.**

6 **Q.** And that lasted for about two weeks, you

7 think?

8 **A. Yeah. I mean, somewhere around there. I**

9 **mean, I learn every day new stuff out there, so --**

10 **Q.** Sure. And then you said someone from Joy

11 Global came out. Who was that person?

12 **A. That's the primary crusher company.**

13 **Q.** Okay. And you said that they did a

14 walk-through of everything. Can you explain that

15 in a little more detail, please?

16 **A. Yeah, we ran the crusher dry and they**

17 **checked all their bearing temps and everything,**

18 **showed us what to look for, what needs to be**

19 **greased on it, how pretty much the crusher**

20 **operates.**

21 **Q.** And can you operate the crusher without

22 the computer program we were just talking about?

23 **A. I don't -- not to my knowledge. I guess I**

24 **can start it in maintenance mode --**

25 **Q.** Okay.

14

1 **A. -- on the actual box in the electrical**

2 **room.**

3 **Q.** Okay. So is the training you got from Joy

4 Global on primarily the mechanical aspects of the

5 crusher?

6 **A. That and the start and stop and how to run**

7 **it in maintenance mode if we've got a problem.**

8 **Pretty much the function of the machine.**

9 **Q.** And how about the -- let me start over.

10 Did you receive training related to how to

11 maintain the coal pile? Start there.

12 **A. Pretty much I know we had to have it**

13 **sloped, you know. And other than that, we kind of**

14 **just built it like a regular stockpile, I guess.**

15 **Q.** When you say "regular stockpile," what do

16 you mean by that?

17 **A. Just as far as keeping the slopes up and**

18 **stuff like that.**

19 **Q.** What specifically do you have to do in

20 order to keep the slopes up?

21 **A. Well, they had to be built first and then**

22 **they've got to be somewhat packed, you know, so**

23 **water doesn't penetrate down through, because that**

24 **can create hot spots. As far as stockpiling and**

25 **stuff, we just got to keep them maintained.**

15

1 **Q.** Is there a specific angle you try to

2 maintain for the slope on the pile?

3 **A. Yeah. They try to get like a**

4 **three-to-one, is what they try to do.**

5 **Q.** Is there a preferred -- start over.

6 Does it matter how much area on top of the

7 pile is flat?

8 **A. I guess I like to keep it flat as far as**

9 **for drainagewise.**

10 **Q.** How much of a flat area would you prefer

11 to keep on top of the pile?

12 **A. Pretty much from the wall all the way to**

13 **my slope I like to keep it to where the water**

14 **drains away from that crusher area. So I guess the**

15 **whole top.**

16 **Q.** Is there a certain height you need to keep

17 the pile at?

18 **A. They like to keep it at like 140 --**

19 **140,000, so, I guess, heightwise we got a yellow**

20 **line on there we don't go past on the wall side.**

21 **Q.** And why don't you go past the yellow line?

22 **A. Because it serves as a berm.**

23 **Q.** And when you say "it serves as a berm," do

24 you mean that it prevents coal from being pushed

25 over the wall?

16

1 **A.** Well, that and, you know, for trucks and
 2 for me.
 3 **Q.** Sure. You said you like to keep it at
 4 140,000; is that right?
 5 **A.** That's what the -- yeah, that's what the
 6 company wants it at, I guess. It fluctuates, I
 7 mean.
 8 **Q.** When you say 140,000, you mean 140,000
 9 pounds?
 10 **A.** Tons.
 11 **Q.** Tons. So 140,000 tons equates to roughly
 12 a certain height on the pile?
 13 **A.** Yeah.
 14 **Q.** Okay. Do you know why the company wants
 15 to keep the pile at roughly that height?
 16 **A.** I don't really know why. I don't know if
 17 it's for -- I don't know.
 18 **Q.** If you had to speculate, why do you think
 19 they would keep it at a certain height?
 20 **MR. WEHLAND:** Objection. Calls for
 21 speculation.
 22 **Q.** (MR. BRAATEN CONTINUING) You can answer.
 23 **A.** Huh?
 24 **Q.** So Chuck can correct me if I'm wrong, but
 25 Chuck -- he'll object sometimes today, and unless

17

1 it's like the situation earlier where it's an
 2 attorney-client privilege issue, he's going to
 3 specifically say don't answer that. And I'm going
 4 to try not to ask you about communications with
 5 your attorney, but other than that, he'll object,
 6 and basically what we're doing is making sure that
 7 we keep that on the record. But other than the
 8 attorney-client privilege stuff, he'll object and
 9 then you still answer the question.
 10 So he's going to say the same objection
 11 again, but if you had to speculate -- if you had to
 12 speculate, why do you think the company would want
 13 to keep the pile at a certain height?
 14 **MR. WEHLAND:** It's impressive how well
 15 Derrick can tell the future. Objection. Calls for
 16 speculation.
 17 **Q.** (MR. BRAATEN CONTINUING) So go ahead and
 18 answer.
 19 **A.** I would say for -- you know, in case -- in
 20 case -- could be for tax reasons. I don't know. I
 21 really don't know. I would say just in case the
 22 crusher breaks, but we've got to push it into the
 23 crusher to get it over there, so --
 24 **Q.** So when we were up there yesterday, you
 25 know, we'd see the trucks come by and drop off coal

18

1 and then see you push that coal into the feeder
 2 system. If there aren't any trucks dropping coal
 3 on a regular basis, do you ever start just scraping
 4 coal off the top of the pile to feed into the coal
 5 facility?
 6 **A.** Yes. I back up to where you guys were at
 7 and I start my pushes there.
 8 **Q.** Okay. So how do you decide how much coal
 9 you're going to push into the feeder during your
 10 shift?
 11 **A.** Just depends on what they need. Like
 12 yesterday they were almost full, so I was just
 13 pushing in what the trucks brought.
 14 **Q.** When you say "they," are you referring to
 15 Coyote Station?
 16 **A.** Yes.
 17 **Q.** Do you check in with the station at the
 18 beginning of your shift every time you work?
 19 **A.** Yeah. I call them on the phone or the
 20 radio.
 21 **Q.** And do they tell you at the beginning of
 22 your shift every day approximately how much coal
 23 they want during that shift?
 24 **A.** I ask them what they have in their barn
 25 and I just push what I can.

19

1 **Q.** Do you know what the maximum capacity of
 2 their barn is?
 3 **A.** Yes.
 4 **Q.** And so if you know what's in their barn
 5 based on what they tell you, do you try to push
 6 enough coal through the facility to make up the
 7 difference between whatever they told you and the
 8 maximum capacity?
 9 **A.** Yeah, I try to go off of -- off their
 10 burn. You know, if they're at full burn, I can
 11 kind of figure out what they burn a day in my
 12 shift, then I add that to what I think they need.
 13 **Q.** Okay. How long is one of your shifts?
 14 **A.** Ten hours.
 15 **Q.** How much coal does the station use at full
 16 burn during a ten-hour shift?
 17 **A.** I figure around 3,000.
 18 **Q.** Tons?
 19 **A.** Yeah.
 20 **Q.** And when you talk to them at the beginning
 21 of your shift, do you ask them if they're at a full
 22 burn?
 23 **A.** No. Sometimes they tell me if they're
 24 derated or not.
 25 **Q.** What does derated mean?

20

1 **A. Means they're not full burn.**
 2 **Q. And do you know why they refer to that as**
 3 **derated?**
 4 **A. No.**
 5 **Q. If they're derated, how much coal do you**
 6 **anticipate they'll burn during a ten-hour shift?**
 7 **A. That I don't know. Just depends on what**
 8 **they're down.**
 9 **Q. Do they communicate that to you?**
 10 **A. No. I don't really get into that. I just**
 11 **kind of see what they need and go off of that.**
 12 **Q. And when you say "see what they need," do**
 13 **you mean what they need to fill up the barn?**
 14 **A. To fill the barn, yes.**
 15 **Q. And so, to your knowledge, if they**
 16 **communicate to you that they're derated, there**
 17 **could be some fluctuation in how much they're going**
 18 **to burn during your shift?**
 19 **A. Yes.**
 20 **Q. Other than at the beginning of your shift,**
 21 **do you communicate with the plant?**
 22 **A. Yeah. I usually take lunch break and then**
 23 **I call them after lunch, tell them I'm going to**
 24 **fire back up.**
 25 **Q. Okay. Do you let them know before lunch**

21

1 that you're shutting down?
 2 **A. No, not always.**
 3 **Q. Okay. And what's the purpose of letting**
 4 **them know after lunch that you're going to start up**
 5 **again?**
 6 **A. I just do it just in case someone is**
 7 **around the belt or something or around the**
 8 **stockpile facility.**
 9 **Q. So when you shut down, you're referring to**
 10 **shutting down the coal plant; right?**
 11 **A. Yes, shut the crushers off.**
 12 **Q. And so when you shut the crushers off,**
 13 **does that also shut the conveyor off?**
 14 **A. No. Their conveyor -- they control their**
 15 **conveyor.**
 16 **Q. The reason I ask is you just said that**
 17 **when you tell them you're starting up, it's because**
 18 **the concern is that someone will be around.**
 19 **A. Oh, their belt is already running. They**
 20 **said I don't have to call, but our policy says I**
 21 **should call.**
 22 **Q. Okay. So when you shut down the crusher**
 23 **for lunch, the conveyor continues to run?**
 24 **A. Yes.**
 25 **Q. And so is the concern that they might not**

22

1 be expecting coal to start coming back through?
 2 **A. Yeah. I just make sure that they're not**
 3 **doing any test on their end, because sometimes they**
 4 **test their belts on the facility.**
 5 **Q. And other than just letting them know that**
 6 **you're going to start up again, do you talk about**
 7 **anything else if you call them after lunch?**
 8 **A. No. Some days when it gets toward the end**
 9 **of the week, I'll see what all they need to fill up**
 10 **their barn, see how much more coal I've got to**
 11 **push.**
 12 **Q. And why is it more important to do that at**
 13 **the end of the week?**
 14 **A. To just make sure they're full for the**
 15 **burn for their weekend because we aren't out there.**
 16 **Q. So you guys shut down for the entire**
 17 **weekend?**
 18 **A. Yeah.**
 19 **Q. When do you shut down on Friday?**
 20 **A. On Friday, yes.**
 21 **Q. What time?**
 22 **A. About four o'clock. I usually shut the**
 23 **crushers off at 3:30.**
 24 **Q. And when do you start them up again on**
 25 **Monday morning?**

23

1 **A. Just depends. I might walk around.**
 2 **Sometimes it's 6:30, sometimes it's 7. Just**
 3 **depends what I got going on.**
 4 **Q. Does anyone at Coyote Creek ever run the**
 5 **crusher over the weekend?**
 6 **A. At -- you're talking at North American?**
 7 **Q. Right.**
 8 **A. I ran it on the weekends, you know, if we**
 9 **had a problem during the week.**
 10 **Q. Okay.**
 11 **A. And other certified people probably ran it**
 12 **on the weekend.**
 13 **Q. Is it the common practice for the crusher**
 14 **to be shut down for the entire weekend, though?**
 15 **A. It's supposed to be, yeah.**
 16 **Q. So you said that you communicate with**
 17 **Coyote Station generally at the beginning of your**
 18 **shift and a lot of times after lunch. Are there**
 19 **any other times during your shift that you would**
 20 **commonly communicate with Coyote Station?**
 21 **A. I call them at the end of the day when I**
 22 **shut down and tell them -- and let them know that**
 23 **I'll be going home and that there's another guy**
 24 **coming on.**
 25 **Q. And what's the purpose of that call?**

24

1 **A. Just to let them know I'm going off shift.**
 2 **Q. Do they ever call you during your shift?**
 3 **A. Yeah, they'll call me if they want to take**
 4 **a belt sample or something like that, or if the**
 5 **plant is full, they'll call me and let me know so I**
 6 **can shut down.**
 7 **Q. Can you describe what you mean by taking a**
 8 **belt sample?**
 9 **A. They take a sample of the coal off the**
 10 **belt. They got a sampler up on their end that does**
 11 **it.**
 12 **Q. You said that there's a policy in place at**
 13 **the mine to let Coyote Station know when you're**
 14 **starting the crusher back up; right?**
 15 **A. I guess I don't know -- it's just what**
 16 **Donn has always told me to do, I guess, said it was**
 17 **our -- you know, we should be doing that.**
 18 **Q. Do you know why Donn thinks it's important**
 19 **to do that?**
 20 **A. I would say just in case they're doing**
 21 **something up there.**
 22 **Q. So because starting up without notifying**
 23 **them could have safety impacts up there?**
 24 **A. Well, I guess they always tell me when**
 25 **their belt is running, they're good to go, but I**

25

1 **just call just as my own safety barrier just in**
 2 **case they got -- you know, someone is up there**
 3 **doing something to other belts.**
 4 **Q. How many times on average would you say**
 5 **you talk to someone at Coyote Station during one of**
 6 **your shifts?**
 7 **A. Probably three.**
 8 **Q. And who do you call at Coyote Station if**
 9 **you're calling someone?**
 10 **A. The control operator.**
 11 **Q. And why do you call the control operator?**
 12 **A. Because he starts and stops the belt.**
 13 **Q. Is that the only job of the control**
 14 **operator?**
 15 **A. I don't know.**
 16 **Q. How often during one of your shifts does**
 17 **the control operator start or stop the belt?**
 18 **A. Usually it's running when I get there, and**
 19 **they usually don't shut it down unless they have**
 20 **to, something happens.**
 21 **Q. Would they ever shut it down without**
 22 **notifying you first?**
 23 **A. They can, but if they shut the belt down,**
 24 **it will shut my crushers down.**
 25 **Q. And so if the belt shuts down, there's an**

26

1 automatic shutdown on the crushers?
 2 **A. Yes.**
 3 **Q. Has that ever happened while you were**
 4 **working at the facility?**
 5 **A. Yeah, it's happened.**
 6 **Q. And what was the reason for it happening?**
 7 **A. A deer hit the cable switches trying to**
 8 **crawl under it. Their belt sampler stopped the**
 9 **belt for -- just when it goes to take a sample, it**
 10 **sometimes stops the belt.**
 11 **Q. How many times has that happened since**
 12 **you've been working at Coyote Creek?**
 13 **A. I don't know. Quite a bit. I can't**
 14 **count.**
 15 **Q. More than 10?**
 16 **A. Yeah.**
 17 **Q. More than 50?**
 18 **A. Yeah, probably.**
 19 **Q. Does it happen at least once a week?**
 20 **A. It was for a while. They've been trying**
 21 **to work on it to adjust it. Now I've been having**
 22 **them -- I slow my feeder rate down, because what**
 23 **happens is there's too much coal on the belt so the**
 24 **sampler can't get back into place, so I've been**
 25 **slowing my feeder down to get less coal on the belt**

27

1 **so they can take their sample, and it's been**
 2 **working now.**
 3 **Q. How often do they take a sample?**
 4 **A. I don't know. I think they do it like**
 5 **three times a day on day shift, is what it seems**
 6 **like. They don't always tell me they're taking a**
 7 **sample. Sometimes they don't.**
 8 **Q. How do you find out that the crushers are**
 9 **shut down as a result of the conveyor shutting**
 10 **down?**
 11 **A. I got a code that will come up on my**
 12 **screen and then my crushers show they're off.**
 13 **Q. And do you usually follow up with a phone**
 14 **call to the plant when that happens?**
 15 **A. I can call them on the radio, see what's**
 16 **going on or they call me, let me know.**
 17 **Q. If the conveyor shuts down the crusher**
 18 **because the conveyor was shut down, do you always**
 19 **call them or they call you so that you communicate**
 20 **when that happens every time?**
 21 **A. Yeah.**
 22 **Q. And you mentioned that the conveyor**
 23 **usually gets shut down because of their sampler and**
 24 **then you mentioned the deer hitting it. Do you**
 25 **know of any other reasons why the conveyor would**